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Honorable Robert M. McKenna  
Attorney General of Washington  
1125 Washington Street, S.E.  
Post Office Box 40100  
Olympia, Washington 98504

Re: Citizen Action Letter, RCW 42.17.400(4)  
King County Republican Central Committee  
2006 PDC Reporting by "Exempt" and "Non-Exempt" Funds

Dear Attorney General McKenna:

This letter concerns the King County Republican Central Committee (KCRCC) and its failure to file timely and accurate reports with the Public Disclosure Commission during 2006 for both its "Exempt" and "Non-Exempt" Funds". The current Chair of the KCRCC is Michael E. Young, who is an experienced futures trader working for Pacific Futures Trading Company and Sawtooth Discount Futures. The current Treasurer of the KCRCC is Geoffrey Tamman, an accountant working for Deloitte & Touche USA LLP.

I am sending this written notification pursuant to the citizen action provisions of RCW 42.17.400(4) to inform you that I have reason to believe that the KCRCC may have violated numerous provisions of Chapter 42.17 RCW, including RCW 42.17.080(2) for untimely filing of C4 reports of contributions and expenditures and RCW 42.17.080(3) for untimely filing of C3 reports of bank deposits and contributions deposited.

**"Exempt" Fund – Untimely C4 Periodic Contribution & Expenditure Reports**

For the period January 1, 2006 to January 31, 2006, the KCRCC raised \$19,551.74 and spent \$14,063.29. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by February 10, 2006. The KCRCC did not file this C4 report until March 10, 2006, or 28 days late.

For the period March 1, 2006 to March 31, 2006, the KCRCC raised \$17,990.00 and spent \$16,393.99. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by April 10, 2006. The KCRCC did not file this C4 report until May 9, 2006, or 29 days late.

For the period May 1, 2006 to May 31, 2006, the KCRCC raised \$3,117.00 and spent \$15,784.35. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by June 12, 2006. The KCRCC did not file this C4 report until July 5, 2006, or 23 days late.

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For the period June 1, 2006 to June 30, 2006, the KCRCC raised \$28,325.00 and spent \$24,800.10. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by July 10, 2006. On July 13, 2006, the KCRCC filed a C4 report showing only \$1,825.00 in contributions and \$0.00 in expenditures – which was 3 days late. The KCRCC did not report the remaining \$26,500.00 in contributions and \$24,800.10 in expenditures until September 18, 2006, or 70 days after the deadline.

For the period August 23, 2006 to September 11, 2006, the KCRCC raised \$18,621.14 and spent \$3,533.38. RCW 42.17.080(2)(a) required the KCRCC to file a C4 periodic report of contributions and expenditures by September 12, 2006. On September 12, 2006, the KCRCC filed an otherwise timely C4 report showing only \$8,611.14 in contributions and all \$3,533.38 in expenditures. The KCRCC did not report the remaining \$10,010.00 in contributions until September 18, 2006, or 6 days after the deadline.

There appears to be \$4,045.83 in expenditures by the KCRCC which have never been reported. The C4 report for the period February 1, 2006 to February 28, 2006 shows ending expenditures of \$29,328.76. The C4 report for the period March 1, 2006 to March 31, 2006 shows beginning expenditures of \$33,374.59. The remaining \$4,045.83 was presumably spent during the period February 1, 2006 to February 28, 2006, and should have been reported by March 10, 2006. This reporting would now be 260 days past due.

There also appears to be \$7,500.00 in contributions received by the KCRCC which have never been reported. The C4 report for the period August 23, 2006 to September 11, 2006 shows ending contributions of \$155,725.38. The C4 report for the period September 12, 2006 to October 10, 2006 shows beginning contributions of \$163,225.38. The remaining \$7,500.00 was presumably received during the period August 23, 2006 to September 11, 2006, and should have been reported by September 12, 2006. This reporting would now be 74 days past due.

**“Exempt” Fund – Untimely C3 Bank Deposit and Contribution Reports**

On January 4, 2006, the KCRCC deposited \$3,000.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by February 10, 2006. The KCRCC did not file this C3 report until March 10, 2006, or 28 days late.

On January 12, 2006, the KCRCC deposited \$5,740.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by February 10, 2006. The KCRCC did not file this C3 report until March 10, 2006, or 28 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address for \$100.00 of the contributions on this C3 report.

On January 19, 2006, the KCRCC deposited \$8,746.74. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by February 10, 2006. The KCRCC did not file this C3 report until March 10, 2006, or 28 days late.

On January 30, 2006, the KCRCC deposited \$2,065.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by February 10, 2006. The KCRCC did not file this C3 report until March 10, 2006, or 28 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the occupation and employer for \$575.00 of the contributions on this C3 report.

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On March 6, 2006, the KCRCC deposited \$465.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by April 10, 2006. The KCRCC did not file this C3 report until May 9, 2006, or 29 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, occupation and/or employer for \$150.00 of the contributions on this C3 report.

On March 16, 2006, the KCRCC deposited \$12,500.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by April 10, 2006. The KCRCC did not file this C3 report until May 9, 2006, or 29 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the occupation for \$10,000.00 of the contributions on this C3 report.

On March 22, 2006, the KCRCC deposited \$5,025.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by April 10, 2006. The KCRCC did not file this C3 report until May 9, 2006, or 29 days late.

On June 1, 2006, the KCRCC deposited \$1,825.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by July 10, 2006. The KCRCC did not file this C3 report until July 13, 2006, or 3 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, occupation and/or employer for \$1,640.00 of the contributions on this C3 report.

On June 13, 2006, the KCRCC deposited \$16,500.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by July 10, 2006. The KCRCC did not file this C3 report until September 18, 2006, or 70 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, occupation and employer for \$11,500.00 of the contributions on this C3 report.

On June 28, 2006, the KCRCC deposited \$10,000.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by July 10, 2006. The KCRCC did not file this C3 report until September 18, 2006, or 70 days late.

On July 10, 2006, the KCRCC deposited \$70.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 17, 2006. The KCRCC did not file this C3 report until July 19, 2006, or 2 days late.

On July 11, 2006, the KCRCC deposited \$4,073.50. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 17, 2006. The KCRCC did not file this C3 report until July 19, 2006, or 2 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, occupation and/or employer for \$4,026.50 of the contributions on this C3 report.

On July 13, 2006, the KCRCC deposited \$35.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 17, 2006. The KCRCC did not file this C3 report until July 19, 2006, or 2 days late.

On August 1, 2006, the KCRCC deposited \$4,000.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 7, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 15 days late.

On August 16, 2006, the KCRCC deposited \$5,000.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 21, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 1 day late.

**"Non-Exempt" Fund - Untimely C4 Periodic Contribution & Expenditure Reports**

For the period January 1, 2006 to January 31, 2006, the KCRCC raised \$5,550.00 and spent \$4,012.62. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by February 10, 2006. On March 10, 2006, the KCRCC filed a C4 report showing only \$450.00 in contributions and only \$3,000.00 in expenditures - which was 28 days late. The KCRCC did not report the remaining \$5,100.00 in contributions and \$1,012.62 in expenditures until November 5, 2006, or 268 days after the deadline.

For the period February 1, 2006 to February 28, 2006, the KCRCC raised \$22,482.00 and spent \$32,563.92. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by March 10, 2006. On May 10, 2006, the KCRCC filed a C4 report showing only \$11,000.00 in contributions and all \$32,563.92 in expenditures - which was 61 days late. The KCRCC did not report the remaining \$11,482.00 in contributions until November 5, 2006, or 240 days after the deadline.

For the period March 1, 2006 to March 31, 2006, the KCRCC raised \$4,247.00 and spent \$356.88. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by April 10, 2006. The KCRCC did not file this C4 report until May 10, 2006, or 30 days late.

For the period April 1, 2006 to April 30, 2006, the KCRCC raised \$3,319.00 and spent \$3,650.00. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by May 10, 2006. On May 10, 2006, the KCRCC filed an otherwise timely C4 report showing only \$1,051.00 in contributions and all \$3,650.00 in expenditures. The KCRCC did not report the remaining \$2,268.00 in contributions until November 5, 2006, or 179 days after the deadline.

For the period May 1, 2006 to May 31, 2006, the KCRCC raised \$486.00 and spent \$1,000.00. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by June 12, 2006. On June 29, 2006, the KCRCC filed a C4 report showing only \$0.00 in contributions and all \$1,000.00 in expenditures - which was 17 days late. The KCRCC did not report the remaining \$486.00 in contributions until November 5, 2006, or 148 days after the deadline.

For the period June 1, 2006 to June 30, 2006, the KCRCC raised \$16,766.63 and spent \$11,965.15. RCW 42.17.080(2)(c) required the KCRCC to file a C4 periodic report of contributions and expenditures by July 10, 2006. The KCRCC did not file this C4 report until July 13, 2006, or 3 days late.

For the period July 1, 2006 to August 22, 2006, the KCRCC raised \$19,316.96 and spent \$16,022.86. RCW 42.17.080(2)(a) required the KCRCC to file a C4 periodic report of contributions and expenditures by August 29, 2006. On August 28, 2006, the KCRCC filed an otherwise timely C4 report showing only \$15,243.46 in contributions and all \$16,022.86 in expenditures. The KCRCC did not report the remaining \$4,073.50 in contributions until November 5, 2006, or 68 days after the deadline.

For the period October 11, 2006 to October 30, 2006, the KCRCC raised \$56,443.00 and spent \$66,073.68. RCW 42.17.080(2)(a) required the KCRCC to file a C4 periodic report of contributions and expenditures by October 31, 2006. The KCRCC did not file this C4 report until November 5, 2006, or 3 days late.



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**"Non-Exempt" Fund – Untimely C3 Bank Deposit and Contribution Reports**

On January 3, 2006, the KCRCC deposited \$5,100.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by February 10, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 268 days late.

On January 19, 2006, the KCRCC deposited \$450.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by February 10, 2006. The KCRCC did not file this C3 report until March 10, 2006, or 28 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address for \$100.00 of the contributions on this C3 report.

On February 6, 2006, the KCRCC deposited \$2,650.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by March 10, 2006. The KCRCC did not file this C3 report until May 10, 2006, or 61 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address for \$200.00 of the contributions on this C3 report.

On February 16, 2006, the KCRCC deposited \$8,350.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by March 10, 2006. The KCRCC did not file this C3 report until May 10, 2006, or 61 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the employer and occupation for \$6,100.00 of the contributions on this C3 report.

On February 28, 2006, the KCRCC deposited \$11,482.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by March 10, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 240 days late.

On March 16, 2006, the KCRCC deposited \$2,110.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by April 10, 2006. The KCRCC did not file this C3 report until May 10, 2006, or 30 days late.

On March 23, 2006, the KCRCC deposited \$405.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by April 10, 2006. The KCRCC did not file this C3 report until May 10, 2006, or 30 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, employer and/or occupation for \$200.00 of the contributions on this C3 report.

On March 31, 2006, the KCRCC deposited \$1,732.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by April 10, 2006. The KCRCC did not file this C3 report until May 10, 2006, or 30 days late.

On April 11, 2006, the KCRCC deposited \$218.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by May 10, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 179 days late.

On April 18, 2006, the KCRCC deposited \$788.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by May 10, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 179 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address for \$35.00 of the contributions on this C3 report.

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On April 25, 2006, the KCRCC deposited \$1,262.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by May 10, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 179 days late.

On May 4, 2006, the KCRCC deposited \$354.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by June 12, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 146 days late.

On May 8, 2006, the KCRCC deposited \$132.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by June 12, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 146 days late.

On June 16, 2006, the KCRCC deposited \$15,060.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by July 10, 2006. The KCRCC did not file this C3 report until July 13, 2006, or 3 days late.

On June 23, 2006, the KCRCC deposited \$255.00. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by July 10, 2006. The KCRCC did not file this C3 report until July 13, 2006, or 3 days late.

On June 28, 2006, the KCRCC deposited \$1,024.74. RCW 42.17.080(2)(c) required the KCRCC to file a C3 report for this deposit by July 10, 2006. The KCRCC did not file this C3 report until July 13, 2006, or 3 days late.

On July 18, 2006, the KCRCC deposited \$4,073.50. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 24, 2006. The KCRCC did not file this C3 report until November 5, 2006, or 110 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, employer and/or occupation for \$2,965.50 of the contributions on this C3 report.

On July 18, 2006, the KCRCC deposited \$2,010.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 24, 2006. The KCRCC did not file this C3 report until August 16, 2006, or 23 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, employer and/or occupation for \$1,150.00 of the contributions on this C3 report.

On July 19, 2006, the KCRCC deposited \$1,270.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 24, 2006. The KCRCC did not file this C3 report until August 16, 2006, or 23 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the address, employer and/or occupation for \$1,000.00 of the contributions on this C3 report.

On July 20, 2006, the KCRCC deposited \$525.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 24, 2006. The KCRCC did not file this C3 report until August 16, 2006, or 23 days late.

On July 21, 2006, the KCRCC deposited \$550.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by July 24, 2006. The KCRCC did not file this C3 report until August 16, 2006, or 23 days late.

On July 31, 2006, the KCRCC deposited \$250.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 7, 2006. The KCRCC did not file this C3 report until August 16, 2006, or 9 days late. In addition, the KCRCC did not

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comply with RCW 42.17.090(1)(b) by failing to disclose the address, employer and/or occupation for all \$250.00 of the contributions on this C3 report.

On August 2, 2006, the KCRCC deposited \$1,777.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 7, 2006. The KCRCC did not file this C3 report until August 16, 2006, or 9 days late.

On August 3, 2006, the KCRCC deposited \$422.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 7, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 15 days late.

On August 10, 2006, the KCRCC deposited \$2,996.53. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 14, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 8 days late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the employer and occupation for \$1,750.00 of the contributions on this C3 report.

On August 14, 2006, the KCRCC deposited \$1,029.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 21, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 1 day late.

This August 14, 2006 deposit also contained an excess anonymous contribution in the amount of \$669.00. Under RCW 42.17.060(4), anonymous contributions can only be accepted if the total anonymous contributions accepted to date during the calendar year do not exceed \$300.00 or 1% of total year-to-date contributions, whichever is greater. This anonymous contribution brought total anonymous contributions accepted for 2006 to date to be \$1,290.93. However, total contributions for 2006 to date were \$91,370.36 (based on the August 22, 2006 ending totals on the C4 report), making the limit \$913.70. Therefore, the anonymous contribution limit was exceeded by \$377.23 when this contribution was accepted. On the other hand, it could simply be sloppy accounting by the KCRCC – maybe they didn't keep good records, so they labeled this \$669.00 as "anonymous".

On August 16, 2006, the KCRCC deposited \$600.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 21, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 1 day late.

On August 18, 2006, the KCRCC deposited \$785.00. RCW 42.17.080(3) required the KCRCC to file a C3 report for this deposit by August 21, 2006. The KCRCC did not file this C3 report until August 22, 2006, or 1 day late. In addition, the KCRCC did not comply with RCW 42.17.090(1)(b) by failing to disclose the employer and occupation for \$685.00 of the contributions on this C3 report.

### **Interesting Duplication (?) of Deposit into Both "Exempt" and "Non-Exempt" Funds**

There are two deposits – one in the "Exempt" Fund for \$4,073.50 on July 11, 2006 and the other in the "Non-Exempt" Fund for \$4,073.50 on July 18, 2006 which appear to be exactly identical. The same contributors, same amounts donated by each contributor, and even the same addresses of contributors and ordering of contributors appear for each deposit. This is highly suspicious, since it is extremely unlikely that 18 contributors each wrote two checks out to the KCRCC for identical amounts in July 2006.

One might think this is a duplication of some sort. The "Exempt" Fund filed a C3 report for the July 11, 2006 deposit of \$4,073.50 on July 19, 2006, while the "Non-Exempt" Fund filed a C3 report for the July 18, 2006 deposit of \$4,073.50 on November

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5, 2006. However, there has never been any amendment filed by the "Exempt" Fund to eliminate the July 11, 2006 deposit of \$4,073.50. In fact, this deposit shows up on both the original Schedule A filed by the "Exempt" Fund for the period of July 1, 2006 to August 22, 2006 (which was filed on August 28, 2006), and the amended Schedule A for this same time period (which was filed on September 18, 2006).

It should be investigated to determine whether the KCRCC really made two identical deposits of the same amounts from 18 different contributors into each of the "Exempt" and "Non-Exempt" Funds in July 2006. If this is not in fact what happened, it is certainly interesting that whichever deposit that may have been the duplicated deposit still remains on the books and has not been corrected. It certainly raises the issues that other deposits or expenditures may have been either duplicately reported, or not reported at all. And if this is actually a duplicate deposit, then either the July 11, 2006 date or the July 18, 2006 (for both receiving and depositing the contributions) has to be incorrect.

#### **Missing \$30,268.86 in KCRCC Funds from 12/31/2005 to 01/01/2006**

The C4 report for the KCRCC "Exempt" Fund for the period December 1, 2005 to December 31, 2005 (which was filed on January 10, 2006) shows an ending Cash On Hand balance of \$9,608.88 as of December 31, 2005.

The C4 report for the KCRCC "Exempt" Fund for the period January 1, 2006 to January 31, 2006 (which was filed on March 10, 2006) shows a starting Cash On Hand balance of \$0.00 as of January 1, 2006.

Based on the discrepancy between these two C4 reports for these consecutive periods, the entire December 31, 2005 ending balance of \$9,608.88 for the KCRCC "Exempt" Fund appears to have been eliminated without any explanation.

The C4 report for the KCRCC "Non-Exempt" Fund for the period December 1, 2005 to December 31, 2005 (which was filed on January 10, 2006) shows an ending Cash On Hand balance of \$39,862.15 as of December 31, 2005.

The C4 report for the KCRCC "Non-Exempt" Fund for the period January 1, 2006 to January 31, 2006 (which was filed on March 10, 2006) shows a starting Cash On Hand balance of \$19,202.77 as of January 1, 2006.

Based on the discrepancy between these two C4 reports for these consecutive periods, \$20,659.98 of the December 31, 2005 ending balance of \$39,862.15 for the KCRCC "Non-Exempt" Fund appears to have been eliminated without any explanation.

Altogether, this represents a total of \$30,268.86 in Cash On Hand (adding the "Exempt" and "Non-Exempt" Funds together) that the KCRCC reported having as of December 31, 2005, but no longer having as of January 1, 2006, without explanation.

#### **Analysis and Conclusions**

All of this presents a very serious matter of chronic PDC reporting violations, sloppy accounting procedures, and most alarmingly, over \$30,000.00 of missing funds.

Between January 1, 2006 and October 30, 2006, the KCRCC "Exempt" Fund deposited a total of \$193,000.38 in contributions. \$99,672.24 of these contributions were reported late (or in the case of \$7,500.00, not reported at all) to the PDC on C3 reports and/or C4 reports, or 51.64% of the amount raised. Reports were up to 70 days late.



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Between January 1, 2006 and October 30, 2006, the KCRCC "Exempt" Fund spent a total of \$160,584.20. \$75,087.56 of these expenditures were reported late (or in the case of \$4,045.83, not reported at all) to the PDC on C4 reports, or 46.76% of the amount spent. Reports were up to 70 days late.

Between January 1, 2006 and October 30, 2006, the KCRCC "Non-Exempt" Fund deposited a total of \$142,970.06 in contributions. \$108,242.63 of these contributions were reported late to the PDC on C3 reports and/or C4 reports, or 76.60% of the amount raised. Reports were up to 268 days late.

Between January 1, 2006 and October 30, 2006, the KCRCC "Exempt" Fund spent a total of \$144,643.19. \$115,972.25 of these expenditures were reported late to the PDC on C4 reports, or 80.18% of the amount spent. Reports were up to 268 days late.

There were numerous instances in which the KCRCC failed to report either the address of contributors (required for all contributors of more than \$25.00) or the occupation and employer of contributors (required for all individual contributors of more than \$100.00). I have only mentioned these failures when discussing untimely filed C3 reports. There are probably additional instances of missing contributor information on timely filed C3 reports as well. This seems to have been a persistent problem of KCRCC.

The KCRCC is a major political organization, raising and spending well over \$300,000.00 during 2006. Its Chair and Treasurer are not amateurs – especially not in their regular lives. Chair Michael Young is an experienced securities dealer, who has to be licensed and regulated in his profession, and also has to account for investor and client funds on a constant basis. Treasurer Geoffrey Tamman is an accountant in a major firm.

Moreover, I noticed many of the problems that I am bringing up in this complaint back in August 2006, when I did a much more cursory review of the KCRCC's PDC filings. I was very alarmed by what I saw back then, and brought these problems to the attention of Mr. Young and Mr. Tamman, so that they could try and correct them.

I sent an e-mail detailing what I had noticed to Mr. Young and Mr. Tamman on August 23, 2006. Their responses were interesting. Mr. Young didn't believe that the KCRCC had filed any of its PDC reports late. Mr. Tamman, on the other hand, told me that he had "resigned" as KCRCC Treasurer in February 2006, and that PDC filing was now the responsibility of the office assistant in the KCRCC headquarters!

Mr. Tamman's claim to have "resigned" as KCRCC Treasurer in February 2006 was incredible, since he was still listed (as of August 23, 2006, as well as of today November 25, 2006) on the KCRCC website as the organization's Treasurer. Moreover, there had not been any updated C1PC filed with the PDC showing who the new KCRCC Treasurer was. Under RCW 42.17.050(4)(b), if Mr. Tamman had resigned, the KCRCC was required to designate a new Treasurer and file an updated C1PC with the PDC.

In any event, Mr. Tamman's claim to have "resigned" as KCRCC Treasurer ended up being absolutely false. On October 27, 2006, Mr. Tamman signed two amended C1PC forms (one for the "Exempt" Fund, the other for the "Non-Exempt" Fund), indicating that he was still the KCRCC Treasurer! These C1PC forms were filed on November 3, 2006.

So, needless to say, I am extremely disappointed that the KCRCC continued to have PDC reporting violations, in spite of Mr. Tamman assuring me in his second e-mail of August 23, 2006 that all these problems would be taken care of by the time the 21 day

pre-primary report (due on August 29, 2006) was filed. As it turned out, even as of two days before the general election, there were reports being filed with the PDC that were nearly nine months overdue, and tens of thousands of dollars still remain unaccounted for. This includes the \$30,268.86 which mysteriously disappeared between December 31, 2005 and January 1, 2006 (especially with the January 2006 C4 report being 28 days late).

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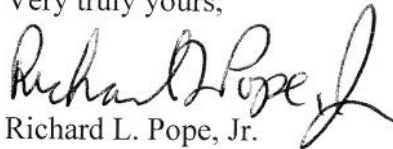
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If enforcement action is not commenced by filing a civil action in court in the name of the State of Washington, within forty-five days of your receipt of this written notification, I reserve my right under RCW 42.17.400(4) to give a second written notification that I will commence citizen's action in the name of the State of Washington over these matters if there has been further failure to so act within ten days of the receipt of such second written notification, and thereafter commence a civil action on my own initiative in the name of the State of Washington over these matters.

I am also forwarding a copy of this citizen action letter to the King County Prosecuting Attorney, which covers the jurisdiction where the KCRCC is headquartered, and the Thurston County Prosecuting Attorney, where the PDC office is located.

Thank you for your careful attention in this matter.

Very truly yours,



Richard L. Pope, Jr.

#### ATTACHMENTS

The following attachments (which total 118 pages) are being sent by E-Mail only:

##### Exhibit A – General Background Materials:

1. C1PC Registration, KCRCC "Exempt" Fund, filed 05/13/2005
2. C1PC Registration, KCRCC "Non-Exempt" Fund, filed 05/13/2005
3. My E-Mail to Michael Young & Geoffrey Tamman, 08/23/2006
4. Geoffrey Tamman E-Mail # 1 to Me, 08/23/2006
5. Geoffrey Tamman E-Mail # 2 to Me, 08/23/2006
6. C1PC Registration, KCRCC "Exempt" Fund, filed 05/13/2005
7. C1PC Registration, KCRCC "Non-Exempt" Fund, filed 05/13/2005
8. KCRCC Website, Leadership Team Listing, 11/24/2006

##### Exhibit B – All KCRCC "Exempt" Fund C4 Reports, 12/01/2005 to 10/30/2006:

1. C4 Report, 12/01/2005 to 12/31/2005, filed 01/10/2006
2. C4 Report, 01/01/2006 to 01/31/2006, filed 03/10/2006
3. C4 Report, 02/01/2006 to 02/28/2006, filed 03/10/2006
4. C4 Report, 03/01/2006 to 03/31/2006, filed 05/09/2006
5. C4 Report, 04/01/2006 to 04/30/2006, filed 05/09/2006
6. C4 Report, 05/01/2006 to 05/31/2006, filed 07/05/2006
7. C4 Report, 06/01/2006 to 06/30/2006, filed 07/13/2006
8. C4 Report, 06/01/2006 to 06/30/2006 (amended), filed 09/18/2006
9. C4 Report, 07/01/2006 to 08/22/2006, filed 08/28/2006
10. C4 Report, 07/01/2006 to 08/22/2006 (amended), filed 09/18/2006

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11. C4 Report, 08/23/2006 to 09/11/2006, filed 09/12/2006
12. C4 Report, 08/23/2006 to 09/11/2006 (amended), filed 09/18/2006
13. C4 Report, 09/12/2006 to 10/10/2006, filed 10/17/2006
14. C4 Report, 10/11/2006 to 10/30/2006, filed 10/31/2006

**Exhibit C – Late KCRCC “Exempt” Fund C3 Reports, 01/01/2006 to 10/30/2006:**

1. C3 Report, \$3,000.00 deposit on 01/04/2006, filed 03/10/2006
2. C3 Report, \$5,740.00 deposit on 01/12/2006, filed 03/10/2006
3. C3 Report, \$8,746.74 deposit on 01/19/2006, filed 03/10/2006
4. C3 Report, \$2,065.00 deposit on 01/30/2006, filed 03/10/2006
5. C3 Report, \$465.00 deposit on 03/06/2006, filed 05/09/2006
6. C3 Report, \$12,500.00 deposit on 03/16/2006, filed 05/09/2006
7. C3 Report, \$5,025.00 deposit on 03/22/2006, filed 05/09/2006
8. C3 Report, \$1,825.00 deposit on 06/01/2006, filed 07/13/2006
9. C3 Report, \$16,500.00 deposit on 06/13/2006, filed 09/18/2006
10. C3 Report, \$10,000.00 deposit on 06/28/2006, filed 09/18/2006
11. C3 Report, \$70.00 deposit on 07/10/2006, filed 07/19/2006
12. C3 Report, \$4,073.50 deposit on 07/11/2006, filed 07/19/2006
13. C3 Report, \$35.00 deposit on 07/13/2006, filed 07/19/2006
14. C3 Report, \$4,000.00 deposit on 08/01/2006, filed 08/22/2006
15. C3 Report, \$5,000.00 deposit on 08/16/2006, filed 08/22/2006

**Exhibit D – All KCRCC “Non-Exempt” Fund C4 Reports, 12/01/2005 to 10/30/2006:**

1. C4 Report, 12/01/2005 to 12/31/2005, filed 01/10/2006
2. C4 Report, 01/01/2006 to 01/31/2006, filed 03/10/2006
3. C4 Report, 01/01/2006 to 01/31/2006 (amended), filed 11/05/2006
4. C4 Report, 02/01/2006 to 02/28/2006, filed 05/10/2006
5. C4 Report, 02/01/2006 to 02/28/2006 (amended), filed 11/05/2006
6. C4 Report, 03/01/2006 to 03/31/2006, filed 05/10/2006
7. C4 Report, 03/01/2006 to 03/31/2006 (amended), filed 11/05/2006
8. C4 Report, 04/01/2006 to 04/30/2006, filed 05/10/2006
9. C4 Report, 04/01/2006 to 04/30/2006 (amended), filed 11/05/2006
10. C4 Report, 05/01/2006 to 05/31/2006, filed 06/29/2006
11. C4 Report, 05/01/2006 to 05/31/2006 (amended), filed 11/05/2006
12. C4 Report, 06/01/2006 to 06/30/2006, filed 07/13/2006
13. C4 Report, 06/01/2006 to 06/30/2006 (amended), filed 11/05/2006
14. C4 Report, 07/01/2006 to 08/22/2006, filed 08/28/2006
15. C4 Report, 07/01/2006 to 08/22/2006 (amended), filed 11/05/2006
16. C4 Report, 08/23/2006 to 09/11/2006, filed 09/12/2006
17. C4 Report, 08/23/2006 to 09/11/2006 (amended), filed 11/05/2006
18. C4 Report, 09/12/2006 to 10/10/2006, filed 10/17/2006
19. C4 Report, 09/12/2006 to 10/10/2006 (amended), filed 11/05/2006
20. C4 Report, 10/11/2006 to 10/30/2006, filed 11/05/2006

**Exhibit E – Late KCRCC “Non-Exempt” Fund C3 Reports, 01/01/2006 - 10/30/2006:**

1. C3 Report, \$5,100.00 deposit on 01/03/2006, filed 11/05/2006
2. C3 Report, \$450.00 deposit on 01/19/2006, filed 03/10/2006
3. C3 Report, \$2,650.00 deposit on 02/06/2006, filed 05/10/2006
4. C3 Report, \$8,350.00 deposit on 02/16/2006, filed 05/10/2006
5. C3 Report, \$11,482.00 deposit on 02/28/2006, filed 11/05/2006
6. C3 Report, \$2,110.00 deposit on 03/16/2006, filed 05/10/2006

7. C3 Report, \$405.00 deposit on 03/23/2006, filed 05/10/2006
8. C3 Report, \$1,732.00 deposit on 03/31/2006, filed 05/10/2006
9. C3 Report, \$218.00 deposit on 04/11/2006, filed 11/05/2006
10. C3 Report, \$788.00 deposit on 04/18/2006, filed 11/05/2006
11. C3 Report, \$1,262.00 deposit on 04/25/2006, filed 11/05/2006
12. C3 Report, \$354.00 deposit on 05/04/2006, filed 11/05/2006
13. C3 Report, \$132.00 deposit on 05/08/2006, filed 11/05/2006
14. C3 Report, \$15,060.00 deposit on 06/16/2006, filed 07/13/2006
15. C3 Report, \$255.00 deposit on 06/23/2006, filed 07/13/2006
16. C3 Report, \$1,024.74 deposit on 06/28/2006, filed 07/13/2006
17. C3 Report, \$4,073.50 deposit on 07/18/2006, filed 11/05/2006
18. C3 Report, \$2,010.00 deposit on 07/18/2006, filed 08/16/2006
19. C3 Report, \$1,270.00 deposit on 07/19/2006, filed 08/16/2006
20. C3 Report, \$525.00 deposit on 07/20/2006, filed 08/16/2006
21. C3 Report, \$550.00 deposit on 07/21/2006, filed 08/16/2006
22. C3 Report, \$250.00 deposit on 07/31/2006, filed 08/16/2006
23. C3 Report, \$1,777.00 deposit on 08/02/2006, filed 08/16/2006
24. C3 Report, \$422.00 deposit on 08/03/2006, filed 08/22/2006
25. C3 Report, \$2,996.53 deposit on 08/10/2006, filed 08/22/2006
26. C3 Report, \$1,029.00 deposit on 08/14/2006, filed 08/22/2006
27. C3 Report, \$600.00 deposit on 08/16/2006, filed 08/22/2006
28. C3 Report, \$785.00 deposit on 08/18/2006, filed 08/22/2006

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**DECLARATION**

I declare under penalty of perjury under the laws of the State of Washington that the above and foregoing is true and correct to the best of my knowledge and belief.

Signed at Bellevue, Washington on November 27, 2006.

  
RICHARD L. POPE, JR.

Cc: Vicki Rippie  
Executive Director  
Public Disclosure Commission  
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King County Prosecuting Attorney  
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Honorable Edward G. Holm  
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2000 Lakeridge Drive, S.W., # 2  
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